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Moorebank Precinct West (MPW) Stage 2 (SSD 7709) Response to Submissions – issues raised by Transport for NSW

SSD-7708

Dear Claire

This letter and its attachment responds to the issues identified by Transport for NSW during their assessment of the MPW Stage 2 Environmental Impact Statement (EIS) (herein referred to as the MPW Stage 2 EIS).

Specifically, **Attachment A** of this letter provides a tabulated response to the issues identified by Transport for NSW as included in the table provided as an attachment to the '*Notice of Exhibition – Moorebank Precinct West – Stage 2*' letter, addressed to Marcus Ray

We would welcome the opportunity to discuss these responses with you further. Do not hesitate to contact Steve Ryan from Tactical Group (0406 995 822) with any questions.

Yours sincerely

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Enc. 1
CC. Nathan Cairney, Steve Ryan, Andrew Wiltshire, Westley Owers

ATTACHMENT A – RESPONSE TO ISSUES RAISED BY TRANSPORT FOR NSW

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4a has not been adequately addressed (Use the background growth models developed by Roads and Martimefor the Liverpool/Moorebank area). In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the SEARS are not met*'.	The background traffic growth used in the operational traffic and transport impact assessment of the Proposal was sourced from the Roads and Maritime's wider Liverpool Moorebank Arterial Road Investigation (LMARI) AIMSUN traffic model, and as such, the OTTIA provided at Appendix M of the EIS is considered to meet SEARs requirement 4a. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs for the Proposal as issued by DP&E, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport. Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct West and Moorebank Precinct East projects (the Moorebank Precinct) and is beyond the scope of the current development application . This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW	Section 1.8, 1.9 and 4.1 of the Operational Traffic and Transport Impact Assessment (OTTIA) (Appendix M of the EIS). Appendix A of the EIS. Section 2 of this RtS.

Aspect	Comment	Response	Reference
		and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission.	
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4b has not been adequately addressed (provide details of the current daily and peak hour light and heavy vehicle, public transport, pedestrian and bicycle movements and existing traffic and transport facilities provided on the road network located adjacent to the proposed development). In their submission, TfNSW noted that '*Further information required by RMS*'.	Daily and peak hour light and heavy vehicle movements were provided in Table 7-7 of Section 7.3.4 of the EIS. Public transport services, including the frequency of movements is described in Section 7.3.7 of the EIS and the existing active transport network near the Proposal is detailed in Section 7.3.8 of the EIS. It is acknowledged that '*further clarification is required by RMS*'. Consultation with Roads and Maritime regarding the wider traffic and transport impacts of the Moorebank Precinct has been ongoing and opportunities have been provided to TfNSW, inclusive of Roads and Maritime for further consultation, specifically regarding the Amended Proposal. At the time of writing, additional consultation specific to the Amended Proposal had not been possible; however, it is expected that the Proponent would continue to consult with TfNSW, inclusive of Roads and Maritime, throughout the detailed design, construction and operational phases of the Amended Proposal, as required.	Table 7-7 of Section 7.3.4, Section 7.3.7 and Section 7.3.8 of the EIS.

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4c has not been adequately addressed (undertake a realistic and justified range of daily peak hour generation scenarios (to be determined in consultation with TfNSW, RMS and Liverpool City Council) including assumptions about light and heavy vehicle movements and the proportion of deliveries by railway and road). In their submission, TfNSW noted that '*Further information required by RMS*'.	Section 5.1 of the OTTIA (Appendix M of the EIS) included details regarding trip generation for the Proposal. As described in Section 5.1, as well and Section 1.9 of the OTTIA, the trip generation used to prepare the operational traffic impact assessment were discussed and agreed in consultation with TfNSW, Roads and Maritime and Liverpool City Council. Section 5.1 of the EIS also includes a summary of the assumptions used for light and heavy vehicle trip generation. Appendix C of the OTTIA further details the traffic generation and underlying assumptions used in the operational traffic impact assessment. It is acknowledged that '*further clarification is required by RMS*'. Consultation with Roads and Maritime regarding the wider traffic and transport impacts of the Moorebank Precinct has been ongoing and opportunities have been provided for further consultation specifically regarding the Amended Proposal. At the time of writing, additional consultation specific to the Amended Proposal had not been possible; however, it is expected that the Proponent would continue to consult with TfNSW, inclusive of Roads and Maritime, throughout the detailed design, construction and operational phases of the Amended Proposal. The EIS for the Proposal (including the OTTIA) included traffic generation scenarios which were determined in consultation with Roads and Maritime. In addition, the OTTIA included information regarding the assumptions of light and heavy vehicle movements and the proportion of deliveries by road and rail. As such, the EIS is considered to meet SEARs requirement 4c.	Section 5.1 of the EIS. Section 1.9, Section 5.1and Appendix C of the OTTIA (Appendix M of the EIS)

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4d has not been adequately addressed (Undertake detailed modelling analysis to assess network operation in consultation with Roads and Martimeand identify intersection upgrade requirements. The modelling package is to be determined by Roads and Martime). In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the SEARS are not met*'.	The OTTIA for the Proposal included detailed modelling analysis to assess network operation, which was undertaken in consultation with Roads and Martime. The outputs of the modelling included an identification of intersection upgrade requirements. <u>Consultation with Roads and Maritime regarding detailed traffic modelling</u> TfNSW, along with Roads and Maritime, have been consulted on a number of occasions since the last quarter of 2015 with regards to the Proposal. In particular, consultation has been based on establishing and agreeing on a suitable approach to the operational traffic modelling to be undertaken for the Proposal, especially in the context of the separate Moorebank Precinct modelling which is being undertaken by MIC for the Moorebank Precinct. Appendix A of the OTTIA includes a summary of consultation undertaken with TfNSW and Roads and Maritime regarding the traffic modelling for the Proposal during the preparation of the EIS. A broader summary of consultation undertaken with regards to the Proposal is provided in Section 6.4 of the EIS. <u>Intersection upgrade requirements</u> Section 6.1 of the OTTIA notes that the road network will need to be improved to cater for the forecast increase in traffic volumes which will result from both the Proposal and general growth in background traffic passing through the area. The traffic modelling analysis carried out for the Proposal as part of the EIS examined the traffic impacts of future traffic demand on the surrounding road network. The analysis included a review of existing infrastructure and identified the required road and intersection improvements needed to mitigate additional traffic generated by both the Proposal and MPE Stage 1 in 2029 (i.e. the cumulative operational scenario).	Section 6.4.1 of the EIS. Sections 5.4.1, 5.4.3, 5.4.4, 5.4.5, 5.4.6 and 5.4.7, and Appendix A of the OTTIA (Appendix M of the EIS).

Aspect	Comment	Response	Reference
		Section 6.1 of the operational traffic and transport impact assessment describes the potential infrastructure upgrades required to accommodate the Proposal. The EIS for the Proposal (including the OTTIA) included a detailed traffic modelling analysis in consultation with RMS, as well the identification of a number of required intersection upgrades to accommodate the operation of the Proposal. As such, the EIS is considered to meet SEARs requirement 4d.	
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4e has not been adequately addressed (consider the constructability constraints of proposed upgrade(s) at key intersections, such as vehicle swept paths, geometry and sight lines). In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the SEARS are not met*'.	The Proponent intends to meet with TfNSW and Roads and Maritime in early 2017 to present the findings of traffic modelling that has been undertaken by MIC for the Moorebank Precinct. The modelling to be presented is expected to include but not be limited to the potential impacts of the traffic generated from the operation of the Moorebank Precinct (once completely developed) on the State Road Network. Although related to the whole-of-precinct modelling, the operational traffic and transport impact assessment prepared for the Proposal is relevant to the impacts of this stage of the development of the Moorebank Precinct only, and is not dependent on the whole-of-precinct modelling referred to by TfNSW in its submission. Section 5.4 of the OTTIA describes the proposed site access and network upgrades for the operation of the Proposal. This is further described in Section 6.1 of the OTTIA. <u>Constructability constraints</u> As part of this report, Revised Stormwater and Drainage Design Drawings have been included at Appendix H, which include a swept path analysis of the Anzac Road / Moorebank Avenue, Chatham Avenue / Moorebank Avenue and Bapaume Road / Moorebank Avenue intersections.	Section 5.4 and Section 6.1 of the OTTIA (Appendix M of the EIS) Appendix C of this RtS

Aspect	Comment	Response	Reference
		Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct West and Moorebank Precinct East projects (the Moorebank Precinct) and is beyond the scope of the current development application. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs for the Proposal as issued by DP&E, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	
Adequacy of Environmental Assessment against the SEARs	TfNSW noted that SEARs component 4f has been adequately addressed (provide details of the number of parking spaces, and justification of proposed parking against relevant guidelines / standards and Australian Standards)	Noted	Section 5.9.1 of the OTTIA (Appendix M of the EIS)

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4g has not been adequately addressed (provide details of proposed staff and heavy vehicle accesses (including intersection location, design and site distance) and layout of the internal road network). In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the SEARS are not met*'.	<u>Site access arrangements</u> The proposed site access arrangements for both light and heavy vehicles is provided in Section 7.4.2 of the EIS, and Section 5.4 of the OTTIA. The location of the intersections that would be used for site access are shown on Figure 7-7 of the EIS and Figure 5-7 of the OTTIA. <u>Intersection design</u> The Amended Proposal would include upgrades to the Moorebank Avenue / Anzac Road intersection. A conceptual layout of this upgrade has been provided as part of the Revised Stormwater and Drainage Design Drawings at Appendix H of this report. The final design of these intersections would be undertaken as part of the future detailed design stage. <u>Internal road network</u> The layout of the internal road network was provided as part of the Architectural Drawings at Appendix B of the EIS. As part of the Amended Proposal (as described in Section 6 of this report), the internal road network has been modified to correspond to changes in the warehousing layout. Revised architectural drawings have been provided at Appendix B of this report, which include an overview of the internal road network to be provided as part of the Proposal. The EIS for the Proposal (including the OTTIA) included details of proposed staff and heavy vehicle accesses (including intersection location, design and site distance) and layout of the internal road network. As such, the EIS is considered to meet SEARs requirement 4g.	Section 7.4.2 and figure 7-7 of the EIS Section 5.4 and Figure 7-7 of the OTTIA (Appendix M of the EIS) Appendix B of this RtS

Aspect	Comment	Response	Reference
		Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application . This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs for the Proposal as issued by DP&E, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	
Adequacy of Environmental Assessment against the SEARs	TfNSW noted that SEARs component 4h has been adequately addressed (demonstrate appropriate provision, design and location of on-site bicycle parking, and how bicycle provision will be integrated with the existing bicycle network)	Noted	Section 5.9.2 of the OTTIA (Appendix M of the EIS)

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4i has not been adequately addressed (provide details of service vehicle movements and site access arrangements (including vehicle type and likely arrival and departure times of service vehicles)). In their submission, TfNSW noted that '*Not considered as addressed in the sections nominated by the proponent i.e. Section 1.5, Section 1.6, Section 1.7 and Section 5.1*'.	<u>Service vehicle movements and site access arrangements</u> Service vehicles would access and egress the Proposal site via the Anzac Road / Moorebank Avenue intersection and travel within the Proposal site via the internal road network (refer to the revised architectural drawings at Appendix B for more information regarding the intersection layout and internal road network layout). Both the Anzac Road / Moorebank Avenue intersection and internal road network has been designed to accommodate A-doubles. As service vehicles would be smaller than an A-double, adequate turning provisions will exist for service vehicles throughout the Proposal site. Site access arrangements that would apply to service vehicles are described in Section 5.4 of the OTTIA. <u>Service vehicle type and likely arrival and departure times</u> At the time of writing the EIS and this report, the type of service vehicles, and their likely arrival and departure times were unknown, as service contractors have not yet been engaged for the operation of the Proposal. As a result, the service vehicle types to be used are currently unknown. The likely arrival and departure times of service vehicles at the time of writing is therefore unknown, and would be dependent on the service contractors, once identified. Where possible, service vehicle movements to, from and within the Proposal site would be undertaken outside of the AM and PM peak periods. It is expected that once available, further details regarding the service vehicle type(s), and arrival and departure times of service vehicles accessing and egressing the Proposal would be incorporated into the Operational Environmental Management Plan (OEMP) and Operational Traffic Management Plan (OTMP) for the Proposal.	Section 1.5, 1.6, 1.7 and 5.1 of the OTTIA (Appendix M of the EIS)

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW noted that SEARs component 4j has been adequately addressed (provide details of sustainable travel initiatives for workers and visitors, particularly for the provision of end-of-trip facilities, pedestrian and cyclist facilities in secure, convenient, accessible areas close to main entrances, incorporating lighting and passive surveillance)	Noted	Section 5.9.2 of the OTTIA (Appendix M of the EIS)
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4k has not been adequately addressed (Construction traffic impact assessment). In their submission, TfNSW noted that '*Further information required by RMS*'.	Section 7.4.1 of the EIS provided an assessment of construction traffic impacts associated with the Proposal. This was prepared based on the CTIA provided at Appendix M of the EIS. The CTIA for the Proposal was prepared to address the relevant SEARs issued by DP&E, the MPW Concept Approval conditions and the REMMs. As such, the EIS is considered to meet SEARs requirement 4k. In addition, an updated CTIA has been prepared as part of this report, which is summarised in Section 7 and Appendix C of this report. It is acknowledged that in TfNSW's submission with regards to SEARs component 4k, it was noted that '*further clarification is required by RMS*'. Consultation with Roads and Maritime regarding the wider traffic and transport impacts of the Moorebank Precinct has been ongoing and opportunities have been provided for further consultation specifically regarding the Proposal. At the time of writing, additional consultation specific to the Proposal had not been undertaken; however, it is expected that the Proponent would continue to consult with TfNSW, inclusive of Roads and Maritime throughout the detailed design, construction and operational phases of the Proposal. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	Section 7.4.1 of the EIS Construction Traffic Impact Assessment (CTIA) (Appendix M of the EIS) Section 7 and Appendix C of this RtS

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4l has not been adequately addressed (Operational traffic impact assessment). In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the SEARS are not met*'.	An OTTIA for the Proposal was prepared as part of the EIS, and provided in Appendix M. This assessment was also summarised in Section 7 of the EIS. The OTTIA was prepared to address the relevant SEARs issued for the Proposal by DP&E, the MPW Concept Approval conditions and the REMMS. As such, the EIS is considered to meet SEARs requirement 4d. An addendum OTTIA has also been prepared to assess the operational traffic impacts of the Amended Proposal. This is summarised in Section 7 and Appendix C of this report. Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs for the Proposal as issued by DP&E, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	Section 7 and Appendix M of the EIS. Section 7 and Appendix C of this RtS

Aspect	Comment	Response	Reference
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4m has not been adequately addressed (Consider the use of heavy vehicles able to move two 40 foot containers). In their submission, TfNSW noted that 'The submitted design drawing for the intersection of Moorebank Avenue/Anzac Road is currently being amended by the proponent following a meeting with RMS on 13 December 2016, and subject to finalisation of the traffic modelling. Transport cluster notes Section 4.3.3 Construction methods (p.78) identifies that modifications to the intersections of Moorebank Avenue/Anzac Road and Moorebank Avenue/Bapaume Road would be designed to accommodate an A-Double (which can move two 40 foot containers). Section 4.4.1 Intermodal terminal facility (p.88) states that "The IMT facility would also have capacity to accept heavy vehicles, up to 'double road train' in size".	To ensure the safe and efficient operation of the Proposal, the following intersections have been designed to accommodate the movements of heavy vehicles that can transport two 40 foot containers: • Moorebank Avenue / Bapaume Road • Moorebank Avenue / Anzac Road • Moorebank Avenue / Chatham Avenue A swept path analysis of the concept design of these intersections have been undertaken and have been provided in the Revised Stormwater and Drainage Design Drawings at Appendix H of this report.	Appendix H of this RtS
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4n has not been adequately addressed (Consider the need for a bus stop on Moorebank Avenue). In their submission, TfNSW noted that 'TfNSW supports the potential provision of additional Transit Stop Numbers (TSN) on Moorebank Avenue; however the proponent is in favour of diverting bus services off Moorebank Avenue onto internal roads (page 81). Therefore, TfNSW would need to consider the infrastructure and whether it could accommodate bus services on	A swept path analysis was undertaken for bus movements along the internal road network within the Proposal site. The analysis demonstrated that the design of internal roads allows for bus movements. The internal road network within the Proposal site is shown on Figure 6-1, and the swept path analysis is provided at Appendix H of this report as part of the Revised Stormwater and Drainage Design Drawings.	Section 5.11 of the OTTIA (Appendix M of the EIS)

Aspect	Comment	Response	Reference
	these internal roads. It is requested that the proponent provides TfNSW with these details'.		
Adequacy of Environmental Assessment against the SEARs	TfNSW is of the opinion that SEARs component 4o has not been adequately addressed (provide an updated Traffic Management and Accessibility Plan for the operation of the facility including: 1 measures to prevent heavy vehicles accessing 2 residential streets to maintain the residential 3 amenity of the local community 4 details of public transport services and facilities; 5 details of cyclist facilities; and 6 details of driver code of conduct.). In their submission, TfNSW noted that the Preliminary Operational Traffic Management Plan was reviewed. 7 Not addressed: measures to prevent heavy vehicles accessing residential streets to maintain the residential amenity of the local community 8 Adequately addressed: details of public transport services and facilities; 9 Adequately addressed: details of cyclist facilities 10 Adequately addressed: Strategic outline of driver code of conduct at 5.2	<u>Measures to prevent heavy vehicles accessing nearby residential streets</u> Operational heavy vehicle movements to and from the Proposal site would be undertaken in accordance with the final Operational Traffic Management Plan (OTMP), which would form part of the OEMP for the Proposal. It is intended that the OTMP would be prepared by updating the Preliminary Operational Traffic Management Plan (POTMP) which was provided at Appendix M of the EIS. Section 3.1 of the POTMP notes that heavy vehicle movements to and from the Proposal site would be restricted to the designated truck routes included in the plan, which generally avoid residential areas, where reasonable and feasible.	POTMP at Appendix M of the EIS

Aspect	Comment	Response	Reference
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the Condition 6 of the MPW Concept Approval (*Projects carried out under this staged development consent are to be assessed with the objective of not exceeding the capacity of the transport network, including the local, regional and State road network*). In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the Limits of Approval are not met*'.	The study area used for the OTTIA includes a wider and core traffic study area which were derived from investigations based on previous modelling undertaken for the MPW Concept EIS and the Roads and Maritime LMARI traffic model. The core traffic study area encompasses eight key intersections which have the most potential to be impacted by the Proposal, and were confirmed by Roads and Maritime as appropriate through previous consultation as part of the EIS preparation process. The eight key intersections are shown on Figure 2-2 of the OTTIA at Appendix M of the EIS. Section 5.6 of the OTTIA provides an assessment of the potential impacts of the operation of the Proposal on the core traffic study area. Traffic modelling identified that in 2019 and 2029 with the operation of the Proposal, all intersections within the core traffic study area for the Proposal would operate at either a better than or comparable level of service than without the Proposal, with the exception of the Moorebank Avenue / Anzac Road intersection. The OTTIA prepared as part of the EIS noted that in 2019, the operation of the Proposal would lower the level of service from B to C, and in 2029 the level of service of the Moorebank Avenue / Anzac Road intersection would improve from a level of service F to a level of service D. The traffic modelling in both 2019 and 2029 demonstrates that the operation of the Proposal would not result in the exceedance of capacity on the road network within the core traffic study area. The Moorebank Avenue / Anzac Road intersection layout assessed in the OTTIA was an interim layout, which was designed to cater for the projected background traffic growth and traffic movements associated with the cumulative operational traffic scenario assessed in the EIS (i.e. concurrent operation of the Proposal with the MPE Stage 1 Project).	Section 2.1 and Section 5.6 of the OTTIA (Appendix M of the EIS) Section 7 and Appendix C of this RtS

Aspect	Comment	Response	Reference
		The assessment of traffic and transport related impacts of the Amended Proposal is presented in Section 7 and Appendix C of this report. The assessment includes consideration of the impacts associated with the construction and operation of a further upgraded Moorebank Avenue / Anzac Road intersection, which would cater for the projected background traffic growth and traffic movements associated with 1.55 million TEU throughput across the Moorebank Precinct. Revised traffic modelling of the upgraded intersection included in the Amended Proposal has identified that the Moorebank Avenue / Anzac Road intersection would: • Operate at a Los C in the AM and PM peak in 2019 with the operation of the Proposal only and in the cumulative scenario • Operate at a LoS D in the AM peak, and LoS C in the PM peak in 2029 with the operation of the Proposal only and in the cumulative scenario. To supplement the Addendum OTTIA prepared for the Proposal (and provided at Appendix Mof the EIS) and to respond to the TfNSW submission, a sensitivity test has been conducted to examine the potential impact of re-distributing development traffic at the M5 Motorway / Moorebank Avenue interchange (refer to Appendix C of this RtS). The aim of the sensitivity test was to demonstrate that the M5 Motorway/ Moorebank Avenue interchange would be able to accommodate changes in traffic distribution for vehicles using the M5 Motorway/ Moorebank Avenue interchange to access/ egress the Proposal site without significantly impacting on the operational performance of the interchange.	

Aspect	Comment	Response	Reference
		Specifically, the sensitivity test has modelled a range of traffic distribution assumptions relating to the proportion of Amended Proposal traffic travelling to and from the Proposal site along the M5 Motorway from the west and east of the interchange, to consider whether the road network would be able to accommodate some additional traffic from the Amended Proposal turning right (eastbound) at the M5 Motorway/ Moorebank Avenue interchange from the south approach. The results of the SIDRA modelling demonstrated that the overall intersection performance as a result of redistributing 10%, 20% and 30% of Amended Proposal traffic from turning westbound to eastbound onto the M5 Motorway under the 2029 Cumulative Development scenario remained unchanged in the AM (LOS C) and PM peak (LOS D) when compared to the results in the EIS. Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission.	

Aspect	Comment	Response	Reference
		Appendix A of the EIS includes a description of how the Proposal complies with the SEARs, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	
Consistency of the Proposal with the limits of approval	TfNSW noted that Condition 7 of the MPW Concept Approval has been adequately addressed in the EIS (Concept approval is granted for interstate terminal container freight with a throughput of up to 500,000 TEU p.a).	Noted	EIS
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context Condition 8 of the MPW Concept Approval, which relates to the container freight throughput. In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the Limits of Approval are not met*'.	Condition 8 for the MPW Concept Approval notes that *'For the IMEX terminal, concept approval is granted for the movement of container freight by up to:* *a) Initially 250,000 TEU p.a if the consent authority is satisfied that the Traffic Impact Assessment demonstrates the Proposal would not exceed the capacity of the transport network with or without mitigation measures/upgrades* b) *After the facility has been in operation, an increase of up to an additional 300,000 TEU p.a. if the consent authority is satisfied that traffic movements resulting from the proposed increases in TEU will achieve the objective of not exceeding the capacity of the transport network. The combined movement of container freight on the Subject Site must not exceed 1.05 million TEU p.a*'. The Proposal involves the construction and operation of an IMT facility, including infrastructure to support a container freight throughput volume of 500,000 TEUs per annum. The 500,000 TEU per annum would include a mixture of freight movements from Victoria, Queensland and regional NSW, as well as port shuttle movements. In accordance with approval condition 8, no more than 250,000 TEU of the 500,000 TEU per annum would be received as part of IMEX movements. The remaining rail freight to be received at	

Aspect	Comment	Response	Reference
		the Proposal site would comprise interstate movements, up to 500,000 TEU per annum, in accordance with approval condition 7. The MPW Concept Modification rRtS (Arcadis, 2016), was placed on public display for exhibition and comment from 14 December 2016 to 24 February 2017. The Amended Modification Proposal presented in the MPW Concept Modification RtS included modifications to the built form and function of the interstate terminal on the Proposal site, namely by re-classifying the freight that can be handled through the existing approved interstate terminal to include intrastate and port shuttle freight movements. Should the Amended Modification Proposal be approved, the Proposal would continue to comply with the Conditions 7 8 of the MPW Concept Approval, and would not exceed the 1.05 million TEU p.a. As such, the Amended Proposal is considered to comply with Condition 8 of the MPW Concept Approval . Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application before DP&E. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the MPW Stage 2 SSD Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing.	

Aspect	Comment	Response	Reference
		Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 9 of the MPW Concept Approval relating to the rail link. In their submission, TfNSW noted that '*Sydney Trains is currently considering the material provided including Appendix F Rail Access Report and drawings and will advise if this condition is met*'.	Condition 9 of the MPW Concept Approval notes that '*Concept approval is granted for the rail terminals (IMEX and interstate) incorporating either:* *a) The rail link; or* b) *If a rail link is under construction or has been constructed associated with the SIMTA development as identified in development application MPP10_0193, then only a short connection from the IMEX/interstate terminals to the SIMTA rail connection on the eastern side of the Georges River*'. The Proposal includes a rail link connection which would join the existing Rail Link to the IMT facility, approved as part of the MPE Stage 1 Project (SSD 6766), which is the first stage of development of the MPWE Project (MP10_0193). The description of the Rail Link connection that is included in the Proposal is provided in Section 4.2.2 and Section 4.4.2 of the EIS. The Rail Link connection to be constructed and operated as part of the Proposal would form a short connection from the terminal to SIMTA, and as such, is considered to be in accordance with Condition 9 of the MPW Concept Approval . It is acknowledged that in TfNSW's submission with regards to Condition 9 of the MPW Concept Approval condition 9, it was noted that '*Sydney Trains is currently considering the material provided including Appendix F Rail Access Report and drawings and will advise if this condition is met*'. Consultation with the transport cluster	Section 4.2.2 and Section 4.4.2 of the EIS

Aspect	Comment	Response	Reference
		regarding the wider traffic and transport impacts of the Moorebank Precinct has been ongoing and opportunities have been provided for further consultation specifically regarding the Proposal. At the time of writing, additional consultation specific to the Amended Proposal had not been undertaken; however, it is expected that the Proponent would continue to consult with TfNSW, inclusive of Sydney Trains, where required, throughout the detailed design, construction and operational phases of the Amended Proposal.	
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 9 of the MPW Concept Approval, which relates to Port shuttle operations. In their submission, TfNSW noted that: Response contained in EIS section 8.2.3 Best Practice Review (p.232). Agree that the rail link conditions were subject to the MPE Stage 1 proposal but the PAC was clear that the above rail operations that use the link are the responsibility of the individual proponent/proposal, noting that it applies to port shuttle operations only. The EIS is regarded as incorrect in stating that "Wagons on the Rail link incorporate available best practice technologies for reducing wheel squeal, such as permanently coupled "multipack" steering wagons using Electronically Controlled Pneumatic braking with a wire based distributed power system" as interstate operations would also use the link.	MPW Concept Approval Condition 10, notes that '*Port shuttle operations must use:* *a) Locomotives that incorporate available best practice noise and emission technologies. Prior to construction of the rail link connecting to the site, the Applicant is to submit a report to the Secretary for consideration and approval that has been prepared in consultation with TfNSW and the EPA that justifies the technology proposed and how it meets the objective of best practice noise and emission technologies; and* b) *Wagons that incorporate available best practice noise technologies including as a minimum, permanently coupled 'multi-pack' steering wagons using Electronically Controlled Pneumatic (ECP) braking with a wire based distribution power system (or better practice technology). Prior to the commencement of operation, the Applicant is to submit a report to the Secretary for consideration and approval that has been prepared in consultation with TfNSW and EPA that justifies the technology proposed and how it meets the objective of best practice noise technologies*'.	Section 8.2.3 of the EIS Appendix K of this RtS

Aspect	Comment	Response	Reference
		It is noted that SIMTA would have operational control over approximately 40% of locomotives entering the Proposal IMT facility. Therefore, control over best practice technologies would be limited to 40% of the fleet. All rolling stock within SIMTAs control would incorporate the recommended best practice technologies described in Condition 9 of the MPW Concept Approval. Noise emissions from locomotives not within SIMTAs control (e.g. interstate trains) utilising the rail link would be managed through rail link infrastructure including: • Friction modifiers and automatic rail lubrication systems installed within the Rail link • Track grinding, carried out within the Rail link to ensure the correct profile is maintained on the track to encourage proper rolling stock steering • A rail noise monitoring system, installed and maintained on the Rail link. In addition to the above conditions, all locomotives accessing the Rail link would comply with the noise limits contained in NSW EPA Environment Protection Licence (EPL) #3142, issued to ARTC, and applicable to the operation of the SSFL. Further, SIMTA has had further consideration to the implementation of best practice for the Proposal. Appendix K of this RtS provides additional informationon best practice that is to be undertaken for the Proposal. The approach presented in the revised Best Practice Summary (refer to Appendix K) is considered reasonable, feasible and necessary to achieve long-term emissions reductions throughout the operational life of the Proposal. A commitment for the implementation of this best practice has been included as a mitigation measures in Section 8 of this RtS.	

Aspect	Comment	Response	Reference
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 11 of the MPW Concept Approval, which relates to the installation and maintenance of a rail noise monitoring system. In their submission, TfNSW noted that Port shuttle operations must use: a. locomotives that incorporate available best practice technologies or technologies as agreed through the best practice review and implementation process in accordance with Condition E3 of Schedule 4; and b. Permanently coupled 'multi-pack' steering wagons. The wagons shall use Electronically Controlled Pneumatic (ECP) braking with a wire based distributed power system (or better practice technology). The rationale for the requirements is as follows: 10.1 Locomotives that perform as well as possible in terms of noise and emissions 10.2 Permanently coupled Multi Pack wagons to alleviate stretching and bunching noise 10.3 Steering to alleviate wheel squeal 10.4 ECP to alleviate brake noise as well as bunching and stretching noise It needs to be remembered that utilising high performing rolling stock will have mitigation effects beyond the precinct boundaries. This is particularly relevant as the port shuttles traverse	Section 8.2.3 of the EIS notes that all trains accessing the MPW site from the SSFL would do so via the Rail Link. Approval for the operation of the Rail Link has been sought in the MPE Stage 1 Proposal, which includes a detailed assessment of potential noise impacts associated with the operation of the Rail link between the Moorebank Precinct and the SSFL. Following that assessment, Planning NSW has issued a set of recommended conditions for the operation of the Rail link, including the installation and maintenance of a rail noise monitoring system on the Rail Link. The installation and maintenance of a rail noise monitoring system on the Rail Link is considered best practice for reducing rail noise levels. As part of this RtS, a Best Practice report has been prepared, which outlines the Proponent's commitment to applying best practice measures to the Proposal, including measure relating to rail noise. This Best Practice report (refer Appendix K of this RtS) provides additional information on best practice that is to be undertaken for the Proposal. The approach presented is considered reasonable, feasible and necessary to achieve long-term emissions reductions throughout the operational life of the Proposal. A commitment for the implementation of this best practice has been included as a mitigation measures in Section 8 of this RtS.	Section 8.2.3 (Noise and Vibration BPR) of the EIS Appendix K of this RtS

Aspect	Comment	Response	Reference
	a range of densely populated suburbs between the port and Moorebank. It is important therefore that any noise and emissions requirements reflect best practice in terms of rolling stock design and operations. Given there is one overall precinct the above conditions should be standardised with those applied by the Planning Assessment Commission on 12 December 2016 for the SIMTA Development, in particular Condition G6. Consideration should also be given to requiring compliance from all rolling stock accessing the facility.		
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 12 of the MPW Concept Approval, which relates to consultation about proposed traffic assumptions and mitigation measures. In their submission, TfNSW noted that a Meeting occurred 31 August 2016 however mitigation measures as per sub-section (b) of approval condition 12 were not adequately addressed (*At the meeting, present the scope and assumptions of the mesoscopic/microsimulation traffic modelling, the draft Traffic Impact Assessment and any proposed mitigation measures including timing on the delivery of any proposed measures*). As detailed above *The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in*	Condition 12(b) of MPW Concept Approval states that the Applicant must '*At the meeting, present the scope and assumptions of the mesoscopic/ microsimulation traffic modelling, the draft Traffic Impact Assessment and any proposed mitigation measures including timing on the delivery of any proposed measures*'. TfNSW, along with Roads and Maritime have been consulted on a number of occasions since the last quarter of 2015 with regards to the Proposal. In particular, consultation has been based on establishing and agreeing on a suitable approach to the operational traffic modelling to be undertaken for the Proposal, especially in the context of the separate Precinct modelling which is being undertaken by MIC for the Moorebank Precinct. Appendix A of the OTTIA included a summary of consultation undertaken with TfNSW, Roads and Maritime and Liverpool City Council regarding the traffic modelling for the Proposal during the preparation of the EIS. A broader summary of consultation undertaken with regards to the Proposal is provided in Section 6.4 of the EIS. The consultation undertaken as part of the EIS included a presentation on the traffic and transport impact assessment.	Section 6 of the EIS.

Aspect	Comment	Response	Reference
	February 2017. Accordingly, the SEARS are not met.	The presentation by Arcadis to TfNSW, Roads and Maritime and Liverpool City Council on 27 September 2016 included the provision of information relating to the scope of the traffic and transport impact assessment, the modelling methodology (including scenarios modelled), assumption, results of the modelling and potential road capacity improvements to be implemented on the road network, identified through the outcomes of the traffic modelling The consultation process undertaken throughout the preparation of the EIS in relation to traffic and transport impact assessment is considered to meet the requirements of the MPW Concept Approval condition 12. Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application before DP&E. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	

Aspect	Comment	Response	Reference
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 13 of the MPW Concept Approval, which states that containers must be transferred between the site by rail and Port Botany only, unless where unforeseen circumstances have occurred (e.g an incident). In their submission, TfNSW noted that Appendix A of the EIS states that this condition of approval is addressed in Section 14 of the EIS. However section 14 outlines the hazard and risk assessment undertaken to identify potential hazards and risks from the construction and operation of the Proposal and does not address this condition of approval. The PAC condition is very clear and it should be explicitly stated in the EIS, noting it also only applies to containers from Port Botany.	The movement of freight to and from the Proposal site is described in Section 4 (Proposal description) of the EIS. The reference to Section 14 for this information in the 2 EIS was an error and should have referred to Section 4. MPW Concept Approval condition 13 states that '*containers must be transferred from Port Botany to the site and from the site to Port Botany by rail, unless there is planned track maintenance, or where unforeseen circumstances have occurred (eg an incident, breakdown, derailment or emergency maintenance on the rail line)*'. The Proposal would provide an IMT facility to support the transport of freight by rail between Victoria, Queensland and regional NSW and port shuttle movements. Trains would enter the IMT facility using either the northern or southern Rail link connections, and the Rail link. They would then be unloaded, with freight distributed through one of the following container flows: • Temporarily stored in the IMT facility • Transferred directly by truck to warehousing within the Proposal site • Transferred directly by truck to the MPE site • Loaded directly onto heavy vehicles for distribution to markets via the nearby major road network. The empty trains would then be re-loaded with freight containers from the following locations: • Warehouses within the MPW site (transported to the IMT facility via truck) • Directly brought to the IMT facility by truck • Containers brought to site by rail.	Section 4.4.1 of the EIS

Aspect	Comment	Response	Reference
		Full trains would then be sent interstate, intrastate or via port shuttle to a Sydney-based port (e.g. Port Botany) by means of the Rail link and the SSFL. The movement of freight from the warehouses to locations within the Sydney Greater Metropolitan Region would be based on the market demands of the freight to be distributed by future tenants. It is not expected that freight distribution to Port Botany from warehouses would present a significant vehicle movement, and would not take place as a substitute for the movement of freight by rail to and from Port Botany.	
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 14 of the MPW Concept Approval, which states that Operation of warehousing cannot commence until a rail connection to the SSFL is operational. In their submission, TfNSW noted that Section 4 of the EIS and in particular section 4.2.3 Warehousing was reviewed. Not considered to be specifically addressed in the EIS although it contains a comprehensive description of how the rail connection will be constructed. Section 4.2.3 states the proposal seeks approval for the construction and operation of warehouses. Considered that the approval for the construction of the warehouses should be different to the approval for their operation or dependant on key milestones for the rail connection being made.	The MPW Concept Modification RtS (Arcadis, 2016), was placed on public display for exhibition and comment from 14 December 2016 to 24 February 2017. The Amended Modification Proposal presented in the MPW Concept Modification RtS included modifications to allow interaction between the MPW and MPW sites, allowing for the movement of vehicles south from the MPW site to the MPE site via Moorebank Avenue and vice versa for operations. The Amended Modification Proposal would facilitate for warehousing which is associated with an intermodal terminal (interstate or IMEX) on either the MPW site or the neighbouring MPE site. Supporting the warehousing on the MPW site with either terminal would result in TEU throughput being measured at whichever terminal is supplying/receiving freight to/ from the warehousing. For example, if the MPE IMEX terminal delivers/receives freight to the MPW warehousing this would be measured as a part of the TEU throughput cap of the MPE IMEX Terminal, and the same would apply to the MPW Stage 2 IMT facility. This approach would ensure adherence to all throughput caps across both the MPW and MPE Concept Approvals.	Section 4.2.3 of the EIS MPW Concept Modification RtS Section 1.5 of this RtS

Aspect	Comment	Response	Reference
		All vehicle movements once entering the MPE site would be subject to the separate approvals and conditions under the MPE Concept Plan Approval. The Amended Modification Proposal does not seek to modify the MPE Concept Plan, which is subject to separate approval. Should the Amended Modification Proposal be approved (subject to a separate assessment and determination than this EIS), warehouses on the MPW site would be operational from the commencement of operation of the Rail Link on the MPE site, as part of the MPE Stage 1 project. Should the abovementioned Amended Modification Proposal not proceed, warehouses on the MPW site would not be used prior to the connection of the Proposal site to the Rail Link via the Rail Link connection.	
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 18 of the MPW Concept Approval, which states that the layout of the site shall not prevent a possible future pedestrian connection to Casula Railway Station. In their submission, TfNSW noted that this has not been addressed by the proposal. It only refers public transport access services by the bus feeder service route 901. However, page 52 indicates that the site boundary is on the bank of the Georges River, with Casula Station on the opposite site. The proponent should [prepare] a strategic study of a pedestrian link between the proposal and Casula Railway that includes the identification of a 'footprint' for the pedestrian bridge on the proponent's site free from environmental and other constraints that can be	As stated in Section 7.4.2 of the EIS, the Proposal includes pedestrian and cycle pathways within the development, which connect to the existing surrounding infrastructure. Access to the Proposal from Casula Station is most likely to be undertaken via public transport as it is approximately six kilometres walk from the station. At this stage the Proposal does not include a direct pedestrian access to the station across the Georges River as this is considered unfeasible based on the land ownership and environmental concerns, including impacts relating to biodiversity and flooding. Notwithstanding this, the design of the Proposal does not preclude the development of a direct pedestrian access to the Casula Station should this be considered suitable in the future. As stated above, access to Casula Station is most likely to be undertaken via public transport, namely buses. Section 7.4.2 of the EIS also noted that to improve bus transport access to the precinct, additional bus stops are proposed on the internal road in order to	Section 7.4.2 and Appendix M (OTTIA) of the EIS

Aspect	Comment	Response	Reference
	quarantined from intermodal related development.	ensure a 400 metre walking distance ("as the crow flies") to all proposed warehouses and offices. Whilst there would be additional heavy vehicles on Moorebank Avenue, the service frequencies of the buses are considered low and as such the Proposal is not anticipated to have any substantial impacts on bus public transport services. Recommended mitigation measures provided in Section 7.5.2 of the EIS, relating to operational traffic and transport impacts of the Proposal include the following: 'Consultation would be undertaken with relevant bus provider(s) regarding the potential to extend the 901 bus service (or equivalent) and additional bus stops with the aim of maximising public transport accessibility to and within the Proposal site'. Based on the above information, as taken from the EIS, it is considered that MPW Concept Approval condition 18 has been adequately considered in the EIS, and no further information is required.	
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition 19 of the MPW Concept Approval; which states that '*the layout of the site shall be designed to ensure heavy vehicles associated with the operation of the terminals can be accommodated on site in the event of an incident blocking access to the M5 Motorway/ Moorebank Avenue to avoid queuing on public roads*'. In their submission, TfNSW noted that Specific response to this SEAR not noted although it would generally be expected that significant	In addition to truck parking facilities at each warehouse, the Proposal would include a truck holding bay, which would be located in the north of the Proposal site. These areas of the Proposal site which provide truck parking would provide sufficient truck storage on the Proposal site in the event of an incident blocking access to the M5 Motorway / Moorebank Avenue to avoid queuing on public roads. The truck holding bay is shown in the Architectural drawings at Appendix D of the EIS, and revised Architectural Drawings at Appendix B of this report	Appendix D of the EIS Appendix B of this RtS

Aspect	Comment	Response	Reference
	capacity for truck storage would exist within the site street network and warehouses		
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition E10 of the MPW Concept Approval, which states that Development Applications for either the IMEX or interstate terminal shall include documentation demonstrating how Condition 14 of this approval has been satisfied. In their submission, TfNSW noted that As with Condition 14 it is considered that the approval for the construction of the warehouses should be separated from the approval for the operation of the warehouses. Alternatively warehouse construction / operation approval could be made dependant on key milestones for the IMEX and Interstate Terminal have being met prior.	The MPW Concept modification RtS (Arcadis, 2016), was placed on public display for exhibition and comment from 14 December 2016 to 24 February 2017. The Amended Modification Proposal presented in the MPW Concept Modification RtS included modifications to allow interaction between the MPW and MPE sites, allowing for the movement of vehicles south from the MPW site to the MPE site via Moorebank Avenue and vice versa for operations. The Amended Modification Proposal would facilitate for warehousing which is associated with an intermodal terminal (interstate or IMEX) on either the MPW site or the neighbouring MPE site. Supporting the warehousing on the MPW site with either terminal would result in TEU throughput being measured at whichever terminal is supplying/receiving freight to/ from the warehousing. For example, if the MPE IMEX terminal delivers/receives freight to the MPW warehousing this would be measured as a part of the TEU throughput cap of the MPE IMEX Terminal, and the same would apply to the MPW Stage 2 IMT facility. This approach would ensure adherence to all throughput caps across both the MPW and MPE Concept Approvals. All vehicle movements once entering the MPE site would be subject to the separate approvals and conditions under the MPE Concept Plan Approval. The Amended Modification Proposal does not seek to modify the MPE Concept Plan, which is subject to separate approval. Should the Amended Modification Proposal be approved (subject to a separate assessment and determination than this EIS), warehouses on the MPW site would be operational from the commencement of operation of the Rail Link on the MPE site, as part of the MPE Stage 1 project.	MPW Concept Modification RtS

Aspect	Comment	Response	Reference
		Should the abovementioned Amended Modification Proposal not proceed, warehouses on the MPW site would not be used prior to the connection of the Proposal site to the Rail Link via the Rail Link connection.	
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal Condition E11 of the MPW Concept Approval, which states that all future Development Applications shall include a Traffic Impact Assessment based on background growth models developed by RMS for the Liverpool/Moorebank area (if applicable). In their submission, TfNSW noted that The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the sub-reference is not met	The background traffic growth for the Traffic and Transport Impact Assessment prepared to support the EIS was sourced from Roads and Maritime's wider Liverpool Moorebank Arterial Road Investigations (LMARI) AIMSUM traffic model. As such, the Proposal is considered to comply with Condition E11 of the MPW Concept Approval. Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs , the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	OTTIA at Appendix M of the EIS.

Aspect	Comment	Response	Reference
Consistency of the Proposal with the limits of approval	TfNSW is of the opinion that the EIS does not adequately address the Proposal in the context of Condition E12 of the MPW Concept Approval, which states that All future Development Applications shall demonstrate how the main access to the site has been designed to prevent heavy vehicles associated with the facility from using Moorebank Avenue south, and should be accompanied by a detailed engineering drawing(s) In their submission, TfNSW stated that this is Yet to be fully addressed. Index at pg 23 of the Operational Traffic and Transport Impact Assessment states this issue is addressed at Section 5.2 of same. Section 5.2 predicts traffic generation it does not demonstrate how the main access to the site has been designed to prevent heavy vehicles associated with the facility from using Moorebank Avenue south. It does not cross-reference to detailed engineering drawing(s).	It is acknowledged that MPW Concept Approval E12 did not permit IMT related heavy vehicle movements from using Moorebank Avenue south. The MPW Concept Modification RtS (Arcadis, 2016) seeks to modify this condition to facilitate for the movements of vehicles from the MPW site to the MPE site, primarily for the transfer of containers between terminals and associated warehousing. MPW vehicles would utilise Moorebank Avenue to enter and access the MPE site. The Amended Modification Proposal does not seek approval for the use of Moorebank Avenue (south of the MPE site) and/or Cambridge Avenue, during operations. The original MPW CoA E12 (prevention of movements using Moorebank Avenue south) was originally prepared to limit heavy vehicles accessing Cambridge Avenue, rather than limiting right turns out of the MPW site by A and B-doubles. The proposed amendment would enable movements turning right out of the MPW site onto Moorebank Avenue to continue south only until the MPE Stage 1 IMEX site entrance. No movements further south onto Cambridge Avenue would be included. Therefore, the proposed amendment (to discourage vehicles from accessing Cambridge Avenue), is considered to be consistent with purpose of the original MPW CoA E12. In addition, the southern portion of Moorebank Avenue (i.e. between the MPE Stage 1 IMEX site entrance and Cambridge Avenue) is not a Roads and Maritime approved B-double route, therefore movements further south onto Cambridge Avenue are already not permitted. The proposed amendment would also be consistent with this existing Roads and Maritime restriction.	MPW Concept Modification RtS Appendix H of this report

Aspect	Comment	Response	Reference
		The MPW Concept Modification RtS was placed on public display for comment between 14 December 2016 and 24 February 2017, and is subject to assessment and determination by NSW DP&E. Detailed drawings of the upgraded Moorebank Avenue / Anzac Road intersection layout to be provided as part of the Amended Proposal is provided in the Revised Stormwater and Drainage Design Drawings provided in Appendix H of this report. The Amended Proposal has been prepared to align with the Amended Modification Proposal, and as such, allows for heavy vehicle movements to turn right and travel south along Moorebank Avenue to the MPE site only.	
Consistency of the Proposal with the limits of approval	TfNSW noted that the EIS adequately addresses the Proposal Condition E12 of MPW Concept Approval, which states that All future Development Applications shall consider the need for a bus stop on Moorebank Avenue (including direct pedestrian access from the warehousing to the bus stop), and associated turnaround facility suitable for a 14.5 metre long non-rear steer bus. In their submission, TfNSW noted that The proposal states that additional Transit Stop Number's (TSN) would be required to Service the entire site, which is acknowledged by TfNSW. Provision should be made for this infrastructure to be provided such as reserved space for bus stops (3.0m width) and 3.5m road width to be made available. It would be then possible to consider diverting route 901 to ensure service coverage.	Noted	Section 7 and Appendix M (OTTIA) of the

Aspect	Comment	Response	Reference
Consistency of the Proposal with the REMMs	TfNSW noted that the EIS adequately addresses the Proposal in the context of REMM 4A, which states that The Project team would continue to liaise with the Australian Rail Track Corporation, Transport for NSW and other stakeholders responsible for the management of the rail freight network regarding the capacity of the network related to the project. In their submission, TfNSW noted that As outlined in Section 6 of the EIS the proponent has consulted extensively to date and there is confidence this will continue in the future.	Noted	Section 6 of the EIS
Consistency of the Proposal with the REMMs	TfNSW noted that the EIS adequately addresses the Proposal in the context of REMM 4B, which states that As part of the Stage 2 SSD approval(s) process further analysis would be undertaken to determine likely demand distribution and capacity across the rail freight network as it relates to the project. In their submission, TfNSW noted that Section 6 of the EIS details consultation with ARTC and Sydney Trains. Freight Rail network access is administered by ARTC	Noted	Section 6 of the EIS
Consistency of the Proposal with the REMMs	TfNSW noted that the EIS adequately addresses the Proposal in the context of REMM 4C, which requires the installation of a variable message signage system within the Project site to direct heavy vehicles and facilitate safe and efficient access and navigation. In their submission, TfNSW noted that this is Detailed at Section 5.1 and 5.5 of the Preliminary Operational Traffic Management Plan	Noted	Section 5.1 and 5.5 of the POTMP (Appendix M of the EIS)

Aspect	Comment	Response	Reference
Consistency of the Proposal with the REMMs	TfNSW noted that the EIS adequately addresses the Proposal in the context of REMM 4D, which requires the consideration of the provision of pedestrian and cyclist connections from Moorebank Avenue into the Project site. In their submission, TfNSW noted that 'For example Figure 3-3 Proposed Pedestrian and Cyclist Connectivity pg 21 Preliminary Operational Traffic Management Plan'	Noted	POTMP (Appendix M of the EIS)
Consistency of the Proposal with the REMMs	TfNSW noted that the EIS adequately addresses the Proposal in the context of REMM 4D, which requires the consideration of the provision of staff storage and shower areas to promote cycling, jogging and walking as modes of transport. In their submission, TfNSW noted that Section 7.4 discusses the provision of these facilities in the warehouses and defers this consideration to detailed design	Noted	POTMP (Appendix M of the EIS)
Consistency of the Proposal with the REMMs	TfNSW noted that the EIS adequately addresses the Proposal in the context of REMM 4D, which requires the Proponent to Negotiate with bus operators for the provision of additional bus stops and increased bus services between the Project site and nearby public transport interchange hubs to reduce the volume of light vehicles generated by staff. This would be determined based on staff numbers and likely patronage numbers. In their submission, TfNSW noted that TfNSW would determine if increased service frequencies were warranted	Noted	Section 6 of the EIS

Aspect	Comment	Response	Reference
Consistency of the Proposal with the REMMs	TfNSW is of the opinion that the EIS does not adequately address REMM 4H, which relates to operational traffic impacts, arrangements for the on-time delivery of necessary road network improvements, achievement of throughput levels at the terminal and demonstration that the intersection performance would have deteriorated to a Level of Service E or worse (where previously operating at a LoS D or above) were it not for the implementation of the upgrades outlined in Table 7.20 of the [Concept Plan] Response to Submissions report. In their submission, TfNSW noted that '*The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the SEARS are not met*.	The revised OTIA prepared to assess the impacts of the Amended Proposal notes that without the Proposal, all intersections in the core modelled network would operate at a LoS F in the PM peak in 2029, with the exception of Cambridge Avenue/ Glenfield Road and Cambridge Avenue/ Canterbury Road. Section 5.4 of the OTTIA prepared as part of the EIS acknowledged that the MPW Concept RtS provided potential road network solutions which are not to be delivered by the MPW Project. These solutions have been considered in the traffic modelling undertaken regarding traffic impacts associated with the operation of the Proposal (e.g. 2029 with the proposal scenario), in consultation with Roads and Maritime. In 2029 with the Proposal, all intersections would operate at an acceptable LoS, with the exception of the Moorebank Avenue / Heathcote Road and M5 Motorway/ Heathcote Road intersections, which would operate at a LoS F and LoS E respectively. Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development	Section 7.4.2 of the EIS and the OTTIA (Appendix M of the EIS) Section 7 and Appendix C of this RtS

Aspect	Comment	Response	Reference
		only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs , the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	
Consistency of the Proposal with the REMMs	TfNSW is of the opinion that the EIS does not adequately address REMM 4I, which requires the reduction of the volumes of construction vehicles travelling during peak periods, especially if the increase in traffic generated by construction activities impedes on the operation of Moorebank Avenue. In their submission, TfNSW noted that the Proponent's response identifies this issue as addressed at Section 4 and Section 5 of the Construction Traffic Impact Report. This section relies on predictive analysis to show the impacts at peak times are manageable. The proponent should commit to reducing peak period truck movements if the RMS is of the view that construction activities impede the operation of Moorebank Avenue and particularly the M5/Moorebank Avenue intersection.	Construction traffic movements to and from the Proposal site would be undertaken in accordance with the final Construction Traffic Management Plan (CTMP), which would form part of the CEMP for the Proposal. It is intended that the CTMP would be prepared by updating the Preliminary Construction Traffic Management Plan (PCTMP) which was provided at Appendix M of the EIS. Section 3.3.3 of the PCTMP states that 'Mitigation measures identified within the MPW Concept Approval would be implemented during the Proposal' One of these mitigation measures listed in the PCTMP specifically includes 'Reducing the volumes of construction vehicles travelling during peak periods, especially if the increase in traffic generated by construction activities impedes on the operation of Moorebank Avenue'. Section 4.3 and Table 4-1 in the CTIA demonstrates uniform distribution of truck movements between 7am and 5pm 10 hour period. Section 5.12 includes as a mitigation measure to be included within the CTMP "minimising the volumes of construction vehicles travelling during peak periods". The same mitigation measure is included in the EIS in Section 7.5.1	Section 3.3.3 of the PCTMP (Appendix M of the EIS) CTIA (Appendix M of the EIS)
Consistency of the Proposal with the REMMs	TfNSW noted that REMMs 4K, 4L, 4M, 4N and 4P have been adequately addressed in Section 6 and Section 7 of the EIS	Noted	Section 6 and Section 7 of the 2 EIS

Aspect	Comment	Response	Reference
Consistency of the Proposal with the REMMs	TfNSW is of the opinion that the EIS does not adequately address REMM 4Q, which requires the Provision of alternate suitable pedestrian and cycle and facilities during the construction of Moorebank Avenue modifications retaining well defined and well signed routes and paths. In their submission, TfNSW noted that the EIS Only noted mention of alternative routes was in relation to motorists at 5.4 of construction management plan not addressed for pedestrians and cyclists.	Pedestrian and cyclist accessibility during construction of the Proposal would be managed in accordance with the final CTMP, which would form part of the CEMP for construction of the Proposal. It is intended that the CTMP would be prepared by updating the PCTMP which was provided at Appendix M of the EIS. The PCTMP included a number of mitigation measures to be implemented which would minimise impacts of construction of the Proposal on the surrounding road network, including 'Establishing pedestrian walking routes and crossing paths'. In addition, Section 3.3.3 notes that 'Traffic Control Plans (when and where required) will be prepared for the road network surrounding the Proposal, including all primary and secondary access points. Traffic Control Plans (TCP) will be produced for specific construction staging scenarios, depicting vehicle, pedestrian, bus and cyclist restrictions and protection measures'.	Section 3.3.3 of the PCTMP(Appendix M of the EIS)
Consistency of the Proposal with the REMMs	TfNSW noted that REMM 10AE has been adequately addressed in Section 7 and Section 8 of the EIS. In their submission, TfNSW noted that there is an expectation it [REMM 10AE]will be further addressed as part of the detailed design of MPW stage 2.	Noted	Section 7 and Section 8 of the 2 EIS
Consistency of the Proposal with the REMMs	TfNSW is of the opinion that the EIS does not adequately address REMM 19A, which states that The intersection treatments and delivery timing for all cumulative scenarios are presented in Table 7.37 of the [Concept Plan] Response to Submission report; a number of these treatments would be required for a Moorebank project only scenario by 2030.	The intersection treatments and delivery timing for all cumulative scenarios as presented in Table 7.37 of the MPW Concept RtS have been identified as a result of the Proposal, and still apply, regardless of the whole-of-precinct modelling. As such, REMM 19A is considered as being addressed and no further assessment is required.	Chapter 7 of the and the OTTIA (Appendix M of the EIS) MPW Concept RtS

Aspect	Comment	Response	Reference
	In their submission, TfNSW noted that The proponent has advised that they are still refining their analysis of the impact of the proposal on the State Road Network and will present to TfNSW / RMS in February 2017. Accordingly, the REMM's are not met.	Consultation has been undertaken with TfNSW and Roads and Maritime in relation to the scope of the present submission (MPW Stage 2 SSD), in accordance with the SEARs and the requirements of the conditions of approval for the MPW Concept Approval (ref Condition 12). Ongoing consultation is in relation to the traffic modelling that has been undertaken for the combined Moorebank Precinct and is beyond the scope of the current development application. This traffic modelling is currently being progressed by the Proponent as a separate exercise to the traffic modelling undertaken for the Amended Proposal, and is expected to be provided to TfNSW and Roads and Maritime in mid 2017. Consultation with TfNSW and Roads and Maritime in relation to this modelling is therefore ongoing. Although related to the Moorebank Precinct modelling, the operational traffic and transport impact assessment prepared for the Amended Proposal is relevant to the impacts of this stage of the development only, and is not dependent on the Moorebank Precinct modelling referred to by TfNSW in its submission. Appendix A of the EIS includes a description of how the Proposal complies with the SEARs, the MPW Concept Approval conditions and the REMMs, including those relating to traffic and transport.	